

Shukai Chen, et al.

v.

Target Corporation

Court File No.: 21-cv-1247 (DWF/DJF)

Exhibit 14

to Declaration of Annie Santos in Support of
Target Corporation's Opposition to
Plaintiffs' Motion to Enforce Settlement
Agreements
(Filed Under Seal)

Santos, M. Annie

From: MNDdb_Schultz_Chambers <Schultz_Chambers@mnd.uscourts.gov>
Sent: Friday, September 09, 2022 4:11 PM
To: Santos, M. Annie; Sharon S. Almonrode
Cc: MNDdb_Schultz_Chambers; craig_dhhlawfirm.com; David Cialkowski; Ian McFarland; donald_dhhlawfirm.com; Bilal A. Essayli; Silverman, Ellen B.; Weller, Jennifer; Andrew Brown; Dennis A Lienhardt; Zopelis, Heather
Subject: RE: Chen v Target, CA No. 21-cv-1247 Defendant's Request for Conference Call

***** External email *****

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Counsel –

Please meet and confer prior to the 9/15 conference.
This is a conference/status meeting *not* a motion hearing.

Regards,
Terianne Bender
Courtroom Deputy to
Hon. David T. Schultz
612-664-5460

From: Santos, M. Annie <ASantos@hinshawlaw.com>
Sent: Thursday, September 8, 2022 6:35 PM
To: Sharon S. Almonrode <ssa@millerlawpc.com>
Cc: MNDdb_Schultz_Chambers <Schultz_Chambers@mnd.uscourts.gov>; craig_dhhlawfirm.com <craig@dhhlawfirm.com>; David Cialkowski <David.Cialkowski@zimmreed.com>; Ian McFarland <Ian.McFarland@zimmreed.com>; donald_dhhlawfirm.com <donald@dhhlawfirm.com>; Bilal A. Essayli <bessayli@essaylibrown.com>; Silverman, Ellen B. <ESilverman@hinshawlaw.com>; jweller_hinshawlaw.com <jweller@hinshawlaw.com>; Andrew Brown <abrown@essaylibrown.com>; Dennis A Lienhardt <DAL@millerlawpc.com>; Zopelis, Heather <hzopelis@hinshawlaw.com>
Subject: Re: Chen v Target, CA No. 21-cv-1247 Defendant's Request for Conference Call

CAUTION - EXTERNAL:

Dear Magistrate Judge Schultz:

We respectfully disagree with Ms. Almonrode and have attempted to confer with Plaintiffs' counsel on several occasions to no avail. I welcome the opportunity to meet and confer with Ms. Almonrode as she requests prior to the September 15 conference call.

Respectfully,

Annie Santos
Hinshaw & Culbertson LLP
333 South Seventh Street
Suite 2000
Minneapolis, MN 55402
DD: 612.334.2540

On Sep 8, 2022, at 5:14 PM, Sharon S. Almonrode <ssa@millerlawpc.com> wrote:

***** External email *****

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Dear Magistrate Judge Schultz:

We do not have an adequate understanding of what specific issues Defendant intends to raise in this conference call as we have not been served with any motion and there has been no telephonic meet and confer. Counsel for Plaintiffs will, therefore, be unable to adequately prepare for this hearing. Plaintiffs respectfully request that the hearing be taken off the calendar until Defendant has presented Plaintiffs, pursuant to LR 7.1(a), with the specific issues it intends to raise by way of motion, including the specific relief it will seek.

Thank you.

Sharon S. Almonrode
Interim Lead Counsel, *Chen v Target*
The Miller Law Firm, P.C.
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Rochester, MI 48307
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